HEALTH and SAFETY PLAN
Avery Landing Site
46213 St. Joe River Road, Shoshone County, ID 83802
USEPA Site ID No.: IDD984666313
Project Start Date: 28 May 2012

U.S. Environmental Protection Agency, Region 10
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Task Order: 0043

I. Health and Safety Plan Overview

This HASP is required by the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulation (29 CFR 1910.120).

This HASP is incorporated into a written Safety and Health Program (SAHP) as called for under HAZWOPER. The Emergency Management Program at EPA Region 10 has a SAHP for its On-Scene Coordinators (OSCs) that meets their obligations under both HAZWOPER and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) regulations (40 CFR 300). While the SAHP incorporates all HASPs, it relies on HASPs to provide the site-specific details not included in the SAHP. As such, this HASP addresses parts of the SAHP as well as the required elements of a HASP as Site conditions dictate.

This HASP addresses the elements required in Paragraph (b)(4)(ii)(A – J) of HAZWOPER:

- Safety and health risk or hazard analysis
- Employee training assignments
- Personal protective equipment (PPE)
- Medical surveillance requirements
- Air monitoring, personnel monitoring, and environmental sampling
- Site control measures (addresses Site Control Program of SAHP)
- Decontamination procedures
- Emergency response plan
- Confined space entry procedures
- Spill containment program

This HASP may also address those parts of the SAHP that were deferred such as:

- Organizational structure
- Comprehensive workplan
- Training
- Medical surveillance
- Standard operating procedures
- PPE program
- Site control program (deferred to site control measures above)
- Informational program

This HASP will be kept on-Site per Paragraph (b)(4)(i) of HAZWOPER.

This HASP consolidates all other employer HASPs by reference to serve as "the Site safety and health plan" as required by HAZWOPER. Consolidation includes coordination between employers on common HASP elements and is reflected in the discussion for each of the HASP elements here. Checked boxes below indicate these common elements have been coordinated among the site employers:

Yes	N/A	
X		Safety and health risk or hazard analysis
X		Personal protective equipment (PPE)
X		Air monitoring, personnel monitoring, and environmental sampling
X		Site control measures (addresses Site Control Program of SAHP)
X		Decontamination procedures
X		Emergency response plan
X		Confined space entry procedures
X		Spill containment program

II. HASP ACCEPTANCE

A. Employers acknowledge that:

- This is the "Site-specific safety and health plan" and incorporates by reference the HASPs of all on-site employers.
- This HASP "is to facilitate coordination and communication of safety and health issues among site employers.
- This document serves as the EPA HASP.
- They have coordinated on common HASP elements as Site conditions dictate.
- Employer-specific tasks and hazards are addressed in their respective employer HASP.
- They must comply with applicable requirements under 29 CFR 1910.120 (HAZWOPER), 29 CFR 1910 Subpart I (Personal Protective Equipment) and 29 CFR 1910 Subpart Z (Toxic and Hazardous Substances).
- They are responsible for meeting the requirements of HAZWOPER in their own HASP and are not confirming the adequacy of other employer HASPs.
- EPA has informed them of the nature, level and degree of exposure likely as a result of participation in this hazardous waste operation. [HAZWOPER paragraph (j)].
- EPA has informed them of the Site emergency response procedures and any

potential fire, explosion, health, safety or other hazards of the hazardous waste operation, including those identified in the employer's informational program (paragraph (i)). [HAZWOPER paragraph (b)(1)(iv)].

_____ USEPA On-Scene Coordinator	_____ Date
_____ START Project Manager	_____ Date
_____ ERRS Response Manager	_____ Date

B. HASPs incorporated by reference:

- Ecology and Environment, Inc., dated 25 May 2012.
- Environmental Quality Management, Inc., dated 25 April 2012.

III. SITE HISTORY

EPA's Informational Program requires disclosure of health and safety concerns to their employees and contractors.

The Site is the location of a former railroad maintenance and refueling facility for the Chicago, Milwaukee, St. Paul, and Pacific Railroad. The Site was used as a maintenance and refueling facility for the Milwaukee Railroad from 1907 until 1977. The facility included a turntable, roundhouse, machine shop, fan house, engine house, boiler house, storehouses, coal dock, oil tanks, and a pump house. Activities included refueling trains, using solvents to clean engine parts, cleaning locomotives, and maintaining equipment. The facility was located at the end of an electric rail line from the east; at the facility, trains switched to fuel oil and/or diesel locomotives. Fuel oil was stored on-Site in a 500,000-gallon aboveground storage tank (AST). The Milwaukee Railroad began to operate electric locomotives in the mid-1910s and continued until the mid-1970s. All railroad-related structures were removed in the late 1970s and early 1980s. The Site is currently vacant except for a seasonal cabin.

The contaminant of concern is predominantly petroleum, along with volatile organic compounds, semi-volatile organic compounds, polychlorinated biphenyls, and metals present in subsurface soil and groundwater.

Additional information regarding the removal action and road reconstruction scopes of work and major tasks and emergency response procedures is provided in each employer's HASP.

IV. COMPREHENSIVE WORK PLAN

The following is an abbreviated discussion of each employer's scope of work:

- ERRS - Excavate contaminated soils and sediments from the source area, consolidate the contaminated materials within the containment cells, and load the contaminated materials staged at the containment cells into trucks for transportation off-Site for disposal; backfill excavation with clean material; operate the temporary water treatment system; construct and maintain best management practices (BMPs) for control of erosion and sedimentation, fugitive dust, and storm water management, and to minimize and avoid adverse impacts on wildlife; and oversee reconstruction of the FS Highway 50.

- START - Collect contaminated soil and environmental media (air, water) samples; monitor dust and vapor concentrations during removal activities; and observe and document Site activities.

Additional information regarding the project scope of work and/or project tasks is provided in each employer's HASP.

IV. ORGANIZATIONAL STRUCTURE

A. This site-specific organizational structure is a continuation of the organizational structure in the SAHP

Organizational Structure			
Name	**Site Role**	**Employer**	
Earl Liverman	OSC	EPA	
Steve Hall	START Project Manager	Ecology and Environment	
Eric Lindeman	START Safety Officer	Environmental Quality, Inc.	
Jason Coury	ERRS Response Manager	Environmental Quality Management	
Jason Coury	Site Safety Officer	Environmental Quality Management	
1	Field Personnel	Ecology and Environment	
≈ 18	Field Personnel	Environmental Quality Management	

b. Roles and Responsibilities

The following summarizes the roles and responsibilities of those engaged in the health and safety planning and oversight during a hazardous waste operation. The positions and responsibilities defined are not permanent and may be altered or expanded upon to fulfill the operational needs of each unique hazardous waste operation.

- **EPA OSC**: The On-Scene Coordinator (OSC) is the federal official pre-designated by EPA to coordinate and direct responses under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The OSC will be the incident commander when operating under the Incident Command System (ICS). The OSC is also responsible under the NCP for addressing worker health and safety concerns in accordance with HAZWOPER at a response scene. Under HAZWOPER the OSC is the general supervisor who has responsibility and authority to direct all work operations.

- **Safety Officer**: The SO is the site safety and health supervisor, as called for under HAZWOPER, who is minimally responsible for, and has the authority to develop and implement the HASP and verify compliance. The SO reports to the OSC, which is consistent with the command structure under ICS. The OSC is the SO until the OSC delegates that responsibility and authority to someone else. The SO has the authority to halt site work if unsafe conditions are detected. The responsibilities of the SO include:

  - Managing the safety and health functions for on-site employees.
  - Serving as the site point of contact for safety and health matters.
  - Ensuring that site monitoring, worker training, and effective selection and use of PPE are being performed.
  - Assessing site conditions for unsafe acts and conditions and providing input on corrective action.
  - Assisting in the preparation and review of this HASP.
  - Maintaining effective site safety and health recordkeeping.
  - Coordinating with others as necessary for safety and health efforts.

- **Field Personnel:** Field personnel are minimally responsible for:

  - Taking all reasonable precautions to prevent injury to themselves and to their fellow employees.
  - Performing only those tasks that they believe they can do safely and immediately, reporting any accidents and/or unsafe conditions.
  - Implementing the procedures set forth in this HASP and their employer's HASP, reporting any deviations from the prescribed procedures prior to beginning work.
  - Observing the "Buddy System" during work activities, unless otherwise directed.

V. SAFETY AND HEALTH JOB HAZARD ANALYSIS/SAFE WORK PRACTICES

A job hazard analysis (JHA) is a technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. For each anticipated task, identify the potential uncontrolled hazards and the steps to eliminate or reduce them to an acceptable risk level.

Additional information regarding the JHA is provided in each employer's HASP.

Job Hazards Analysis Form					
Task: Site Oversight					
Affiliation: **EPA**				Date: 05/28/12	
Hazards					
Biological Flora & fauna Slip/trip/fall	Environmental Cold & heat Stress Weather extremes Oil & hazardous substances	Excavation & Trenching Water	Heavy equipment operation	Highway	Noise

Specific Steps	**Hazards**	**Abatement Controls** 1. Engineering, 2. Work Practices 3. PPE
Biological	Direct contact	No. 2. Recognition, repellent, warnings.
Environmental	Exposure	Nos. 2 & 3. Clothing, dust suppression, warnings.
Excavation & Trenching	Cave in, steep banks	No. 2. Clothing, communication, line of sight.
Heavy equipment	Routes, visibility	Nos. 2 & 3. Clothing, communication, line of sight.
Highway	Visibility	Nos. 2 & 3. Clothing, communication, warnings.
Noise	Loud equipment	Nos. 2 & 3. Equipment maintenance & repair, hearing protection.
Slip/trip.fall	Uneven work surfaces, debris	Nos. 2 & 3. Good housekeeping, shoes, warnings.
Oil & hazardous substances	Contaminated soil/sediment	Nos. 2 & 3. Awareness, monitor, proper handling, storage.
Water	Slippery surfaces	Nos. 2 & 3. Awareness, buddy system.
Created by: E. Liverman Date:		Approved by: Date:

VI. SITE CONTROL MEASURES (SITE CONTROL PROGRAM)

The SAHP defers development of a Site Control Program to the HASP. This Site Control Program has been coordinated among the employers and is concerned with the safety and security of response personnel and others in the area of the emergency response incident. For the purpose of this HASP, the Emergency Response Plan (ERP), which addresses emergencies inside the exclusion zone, is consider an extension of the Site Control Program.

The Site Control Program consists of the following parts of this HASP:

- ERP
- site communications
- the ‘‘buddy system’’
- the Site map
- Site work zone map
- map to nearest medical assistance
- any standard operating procedures or safe work practices determined for this site

A. Emergency Response Plan

An ERP is provided in the each of the company HASPs listed on page 5 of this document.

A hotwash will be conducted with those involved with any emergency response. The meeting will be documented, including any required follow-up actions and assigned responsibilities.

Emergency Response Overview				
Emergency Type	**Location(s)**	**Related Maps**	**Com. Method**	**Procedure**
Medical Emergency	Site Wide		Radio/Voice	Notify FOSC and/or ERRS Response Manager ERRS Response Manager is responsible for rendering first aid and maintains a cache of medical supplies
Fire or Explosion	Site Wide		Radio/Voice	Notify FOSC and/or ERRS Response Manager
Spills, leaks, or releases	Site Wide		Radio/Voice	Notify FOSC and/or ERRS Response Manager
Other emergency situations such as vehicle, violence, weather	Site Wide		Radio/Voice	Notify FOSC and/or ERRS Response Manager

B. Site Communications

Modes of communication to be used during the event include:

- Radio
- Cell phone
- Hand signals
- Visual contact

C. Site Communications Overview

Site Communications Overview			
Organization/Agency/Event	**Contact Name**	**Communication Device**	**Number/Channel/Pattern**
Medical	Avery Ranger Station	Cell Phone	911 or
Medical	Benewah Community Hospital	Cell Phone	911 or 208.245.5551
Ambulance	Avery Ranger Station	Cell Phone	911 or 245.4517
Fire	St. Maries Fire	Cell Phone	208.245.5253
Law Enforcement	Benewah County Sheriff	Cell Phone	911 or 208.245.2555
Law Enforcement	Shoshone County Sheriff	Cell Phone	911 or 208.556.1114
Federal On-Scene Coordinator	Earl Liverman	Radio/Cell Phone	208.245.0147 208.659.8241 208.245.5085
Site Workers	All	Radio	Channel 1

Additional information regarding emergency contacts, numbers, and equipment available on-Site is provided in each employer's HASP.

D. Buddy System

Buddy System Overview		
Employer	**Task**	**Description**
EPA	Oversight and/or inspection	OSC will have a radio and/or will be within sight of another site worker or START.

Additional information regarding the buddy system is provided in each employer's HASP.

E. SITE WORK ZONES

The need for Level D personal protective clothing (PPE) is activity-based. Level D is required for personnel who are directly involved with cleanup activities such as excavation, backfilling, loading and hauling contaminated materials, and water treatment. Level D is not required for personnel who are not directly involved with cleanup activities such as field accounts, highway flaggers, and highway reconstruction personnel.

VII. PERSONAL PROTECTIVE CLOTHING (PPE)

This section addresses PPE to be used by EPA employees for each of the site tasks and operations being conducted.

PPE is selected after first considering engineering controls then administrative controls or combination of all three as means of hazard controls. OSCs operate under a PPE program found in the SAHP. This element of the HASP is an extension of the PPE program.

If a task the OSC performs at this site requires him or her to wear a respirator, it is noted that the OSC is enrolled in a respiratory protection program, a subset of the PPE program, and is fit-tested annually in accordance with 29 CFR 1910.134(f).

PPE requirements for EPA employees are addressed in the applicable JHAs. See the JHA for further information.

EPA PPE Requirements		
Task	**Level of Protection**	**Description**
Oversight Inspection	*Level D*	*Hard Hat, eye protection, steel-toed boots, safety vest, hearing protection.*
Contractors	*Level D & Level C*	*Additional information regarding PPE requirements is provided in each employer's HASP.*

As an extension of the PPE Program, tailgate safety briefings will address the following elements as needed:

- how to select proper PPE based upon site hazards
- use and limitation
- work mission duration
- maintenance and storage
- decontamination and disposal
- proper fitting
- donning and doffing procedures
- inspection procedures (prior to, during, and after use)
- limitations during temperature extremes
- appropriate medical considerations including heat stress

Additional information regarding the buddy system is provided in each employer's HASP

VIII. DECONTAMINATION PROCEDURES

Employers have coordinated on common decontamination procedures which have been addressed in accordance with paragraph (k) of HAZWOPER and are provided here. Employers with tasks and PPE that call for different decontamination procedures have addressed those procedures in their respective HASP.

EPA employees will follow the common decontamination procedures. Otherwise, EPA employees will follow decontamination procedures of other employer as warranted by task and PPE.

Common decontamination procedures:

Decontamination Overview				
Employer	**Item/Worker**	**Related Map #**	**# of Steps**	**Description/Steps**
All on-Site personnel	Level D & Level C Worker	N/A	1	It is not anticipated that on-Site workers must complete personal decontamination procedures, except for foot wear and field wash hands and face.

Additional information regarding equipment decontamination and personnel decontamination is provided in each employer's HASP.

IX. PERSONNEL MONITORING

A. Contaminant Action Levels

The following is a summary of the action levels to be adhered to by EPA employees. EPA/E&E is tasked with maintaining and calibrating monitoring equipment while on-Site as well as conducting the monitoring unless otherwise indicated.

The frequency and types of air and personnel monitoring and instrumentation to be used, including methods of maintenance and calibration of monitoring and sampling equipment to be used will be addressed in each employer's HASP.

	MINIMUM CONTAMINANT ACTION LEVELS			
Hazard	**Monitoring Equipment***	**Employer Assigned**	**Action Level**	**Action**
Explosive atmosphere	MultiRae multiple gas monitor with explosimeter	START	< 10 % LEL 10–25 % LEL > 25 % LEL	Continue work Continue with caution Leave area
Oxygen	MultiRae multiple gas	START	< 19.5 % O_2 19.5-23.5 % O_2	Leave area Continue work

	monitor with oxygen sensor		> 23.5 % O_2	Leave area
Unknown organic vapors	PID for Organic vapor monitoring in breathing zone, 5 minute averages	START	<1 unit above background 1-5 units above background 5-500 units above background	Level D Upgrade to Level C Upgrade to Level B
Particulates	Particulate monitor	START	> 2.5 mg/m^3	Upgrade to Level C or implement engineering controls

*Unless otherwise noted, these instruments were maintained and calibrated by contractors at the EPA warehouse.

B. Monitoring Schedule

MONITORING SCHEDULE				
Task	**Monitoring Equipment**	**Upon Entry or Continuous**	**Periodic**	**Perimeter**
START will perform monitoring as shown in the Ecology and Environment HASP.				

C. Confined Space Entry

There are no tasks at this Site requiring confined space entry.

X. SPILL PREVENTION AND RESPONSE

A spill containment program, meeting the requirements of paragraph (j) of HAZWOPER, is addressed in Environmental Quality Management's (EQM) HASP. EQM is tasked with any necessary performing the clean-up.

XI. EMPLOYEE TRAINING ASSIGNMENT

The OSC is trained to the level of responsibility as required in paragraph (e) of 29 CFR 1910.120 and is current in HAZWOPER training and medical surveillance. In addition, the OSC has had the management and supervisory training required in paragraph (e). OSC training covers decontamination procedures, emergency response plans, confined space entry, and spilled containment procedures, the

four key discussion elements in this HASP. The OSC Safety and Health Training Program can be found in the SAHP.

All EPA employees engaged in field activities are required to meet EPA Order 1440.2, *Health and Safety Requirements for Employees Engaged in Field Activities*. No EPA employee will be allowed in the exclusion zone who has not completed the requisite training under HAZWOPER.

A pre-entry briefing (tailgate safety briefing) as required by Paragraph (b)(4)(iii) of HAZWOPER will be held at the start of each operational period and is considered part of the OSC Employee Training Program.

Other onsite employers will address their employee training assignments in their respective site specific HASP.

XII. MEDICAL SURVEILLANCE

The OSC is enrolled in a medical surveillance program and has been medically cleared to work in uncontrolled hazardous waste operations and if necessary wear respirators (Level A-C). The Medical Surveillance Program is discussed in the SAHP.

Medical surveillance requirements for non-EPA employees are addressed in their employor's HASP. Medical surveillance clearance records will be kept on-Site or be produced within 24 hours of any request.

Medical surveillance requirements do not apply to workers who work in the support zone.

XIII. MAPS

Attached are the following maps:

- Site Features
- Exclusion Zone
- Hospital Route

HASP ACKNOWLEDGEMENT AND PRE-ENTRY BRIEFING

A pre-entry briefing is required by HAZWOPER at 29 CFR 1910.120(b)(4)(iii). The following EPA employees have received a pre-entry briefing and understand the requirements and procedures of this HASP.

_____ Signature _____ Print Name	_____ Date

_____ Signature _____ Print Name	_____ Date
_____ Signature _____ Print Name	_____ Date
_____ Signature _____ Print Name	_____ Date
_____ Signature _____ Print Name	_____ Date
_____ Signature _____ Print Name	_____ Date

Health And Safety Plan Amendment			Amendment No.: ☐1 ☐2 ☐3 ☐4
Site Name:		**Amendment Date:**	
Describe change(s) to HASP:			
List additional activities, hazard evaluations, or monitoring activities:			
The terms set forth in the original HASP (Dated / /) shall remain in effect with the exception of those changes detailed on this form. This amendment is not needed for employer HASP modifications.			

_____ USEPA On-Scene Coordinator	_____ Date
_____ START Project Manager	_____ Date
_____ ERRS Response Manager	_____ Date